U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 4, 2015

<u>Via ECF</u>

Honorable Katherine B. Forrest
United States District Judge
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

  Re: *Grand Manor Health Related Facility, Inc. v. Koskinen, et al.*, Civ. No. 14-10130
    (KBF)

Dear Judge Forrest:

  This Office represents defendants John Koskinen, in his official capacity as Commissioner of the Internal Revenue Service, the Internal Revenue Service, Julian Castro, in his official capacity as Secretary of the United States Department of Housing and Urban Development, and the United States Department of Housing and Urban Development (the "Federal Defendants") in the above-referenced matter. Pursuant to the Court's February 18, 2015 Order (Dkt. No. 27), the Federal Defendants were instructed to submit an interim stay agreement on behalf of the parties, and inform the Court as to whether the parties reached a resolution regarding the mortgage arrears at issue in this matter by today. I write respectfully to inform the Court that while the parties have made progress towards a final stipulation and interim stay agreement, they are still attempting to resolve payment of the outstanding mortgage arrears, and have not yet finalized any related stay agreement. Accordingly, after discussion with, and upon consent of the parties, I respectfully request a one-week extension—from March 4, 2015, until March 11, 2015—to submit an interim stay agreement and proposed resolution of the mortgage arrears issue.

  I thank the Court for its consideration of this issue.

      Respectfully submitted,

      PREET BHARARA
      United States Attorney for the
      Southern District of New York

    By: <u>s/ Natasha L. Waglow</u>
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